

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MEDIDATA SOLUTIONS, INC. and
MDSOL EUROPE LIMITED,

Plaintiffs,

v.

VEEVA SYSTEMS INC.,

DEFENDANT.

Civil Action No. 1:17-cv-00589-LGS-RWL

DEMAND FOR JURY TRIAL

**DECLARATION OF CLAUDIA RAY IN SUPPORT OF PLAINTIFFS MEDIDATA
SOLUTIONS, INC. AND MDSOL EUROPE LIMITED'S RESPONSE TO VEEVA
SYSTEMS INC.'S MOTION IN *LIMINE* NO. 14 TO EXCLUDE TESTIMONY FROM
MEDIDATA EXPERT DAVID HALL**

I, Claudia Ray, declare as follows:

I am a partner in the law firm of Kirkland & Ellis LLP and counsel for Plaintiffs Medidata Solutions, Inc. and MDSOL Europe Limited (collectively, "Medidata") in the above-captioned matter. I am licensed in the State of New York and admitted to practice before this Court. I submit this declaration in support of Medidata's Response to Veeva Systems Inc.'s Motion *in Limine* No. 14. The statements set forth in this declaration are based on my personal knowledge and my review of the contemporaneous documents referenced and attached hereto.

1. Attached hereto as Exhibit A is a true and correct copy of excerpts from the Updated and Revised Expert Report of David Hall, CMA, CVA, CFE, MBA, dated September 24, 2021.

2. Attached hereto as Exhibit B is a true and correct copy of excerpts from production document bearing bates number MED0139135.

3. Attached hereto as Exhibit C is a true and correct copy of production document bearing bates number VEEVA-MEDI-10001371.

4. Attached hereto as Exhibit D is a true and correct copy of excerpts from production document bearing bates number VEEVA-MEDI-10296142.

5. Attached hereto as Exhibit E is a true and correct copy of letter from S. Lawson to C. Ray, dated August 23, 2019.

6. Attached hereto as Exhibit F is a true and correct copy of letter from L. Lawson to C. Ray regarding S. Pepe, dated June 27, 2017.

7. Attached hereto as Exhibit G is a true and correct copy of letter from L. Lawson to C. Ray regarding M. Marlborough, dated June 27, 2017.

8. Attached hereto as Exhibit H is a true and correct copy of letter from L. Lawson to C. Ray regarding A. Mateo, dated June 27, 2017.

9. Attached hereto as Exhibit I is a true and correct copy of letter from L. Lawson to C. Ray regarding J. Rizzo, dated June 27, 2017.

10. Attached hereto as Exhibit J is a true and correct copy of production document bearing bates number VEEVA-MEDI-10337496.

11. Attached hereto as Exhibit K is a true and correct copy of production document bearing bates number VEEVA-MEDI-10351752.

12. Attached hereto as Exhibit L is a true and correct copy of excerpts from the deposition transcript of Rick Piazza, dated October 6, 2021.

13. Attached hereto as Exhibit M is a true and correct copy of excerpts from the deposition transcript of Michael Wendell, dated October 5, 2021.

14. Attached hereto as Exhibit N is a true and correct copy of excerpts from Plaintiffs Medidata Solutions Inc. and MDSOL Europe Limited's Supplemental Written Objections and

Responses to Defendant Veeva Systems Inc.'s Second Set of Interrogatories (Nos. 5 & 7), dated November 15, 2019.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct pursuant to 28 U.S.C. § 1746.

Dated: October 15, 2021

/s/ Claudia Ray

Claudia Ray